## MEMO ENDORSED

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October 15, 2021

## **BY ECF**

**JAMES KOUSOUROS** 

FOUNDER & PRINCIPAL

The Honorable Nelson S. Román United States District Judge Southern District of New York 300 Quarropas St. White Plains, NY 10601-4150 USDC SDNY
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Re: <u>United States v. Marcus Chambers</u>, 20 Cr. 572 (NSR)

Dear Judge Román,

We write to request a final 30-day extension with which to file motions in this case. We have been in communication with the Government and our negotiations towards a resolution of this case continue. Given the charges and Mr. Chambers' status as a sentenced individual, the negotiations are complicated, and we require additional time to attempt to finalize them. The parties agree that finalizing these negotiations is preferable to the filing of motions at this time.

Thank you for your courtesy and consideration.

Respectfully submitted,
\_\_\_\_\_/s/\_\_\_
James Kousouros, Esq.

c.c.

Christopher Brumwell Olga Zverovich Assistant United States Attorneys Def. Chambers's (01) request for an extension of the motion briefing schedule (ECF No. 41) is GRANTED without objection by the Gov't as follows: moving papers shall be filed November 17, 2021; Govt's response shall be filed on December 17, 2021; and reply papers shall be filed on January 3, 2022. Counsel shall provide two hard courtesy copies to the Court as their respective papers are filed. The Clerk of Court is kindly requested to terminate the motion (ECF No. 41).

DATED: 10/18/2021 White Plains, NY

SO ORDERED:

HON, NELSON S. ROMAN UNITED STATES DISTRICT JUDGE